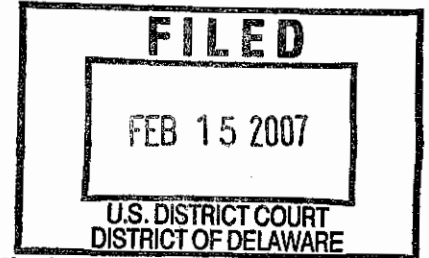


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al., :
Plaintiffs, :
v. : Civil Action No. 05-823-***
STANLEY TAYLOR, et al., :
Defendants. :



INTERROGATORIES

DIRECTED TO EACH NAMED DEFENDANT: Michael Knight, Chris Senato, *BD scanning*
Joseph Atkins, Debbie Melvin, Richard Crockett, Robert Manuel, Darrell Mullins,
Wenston White, Steven Raynor, and Bethany Evans.

COMES NOW the Plaintiffs, propounds the following Interrogatories to
the named Defendants, subject to the conditions set forth below:

a. These Interrogatories are continuing in character, so as to require you
to file supplementary answers if you obtain further or different information before
trial.

b. Where the name or identity of a person is requested, please state full
name, home address and also business address, if known.

c. Unless otherwise indicated, these Interrogatories refer to the time,
place and circumstances of occurrence mentioned or complained of in the pleadings.

d. Where knowledge or information in possession of a party is requested,
such request includes knowledge of the party's agents, representatives and, unless
privileged, his attorneys. When answer is made by a corporate Defendant, state
the name, address and titled of the person supplying the information, and making
the Affidavit, and the source of his/her information.

e. The pronoun "you" refers to the each party to whom these Interrogatories
are directed, and the persons mentioned in clause (d).

1. State in your own words the manner in which the incident which forms the subject matter of the "Amended Complaint" occurred. Include a detailed description of the events which led to the excessive heat/cold in the SCI Main Kitchen Unit.

2. State whether you received any complaints from inmate kitchen workers in regards to excessive heat/cold at the SCI Main Kitchen Unit. If so, state specifically and in detail what steps were taken by you in that matter.

3. Name all persons who investigated the facts of the inmate kitchen workers' complaints.

4. Name all persons, including SCI maintenance (DOC) personnel, DOC personnel and/or any private agency who inspected, maintenance or repair the exhaust ventilation units at the SCI Main Kitchen Unit after the filing of the Original Complaint.

5. Give the name and position of any agents, servants or employees of the Delaware Department of Corrections who made or caused to be made any statement, oral or written or otherwise recorded to individual concerning inmate kitchen workers are not to allow to wear DOC issued jacket and hat during extremely cold days in the kitchen.

6. State the maximum of inmate kitchen workers allowed on each shift prior to the filing of this Complaint.

7. State specifically and in detail, the furniture design in the inmate breakroom, and the number of toilet facilities available for inmate kitchen workers (number of toilet seats and urinals).

8. Identified the area where inmate kitchen workers are ordered to consume food and beverages. State specifically in area size the measurements of that area.

9. State specifically and in detail the number of vermin control equipment are installed in the SCI Main Kitchen Unit. If there is a diagram or layout of the kitchen are, produce such document.

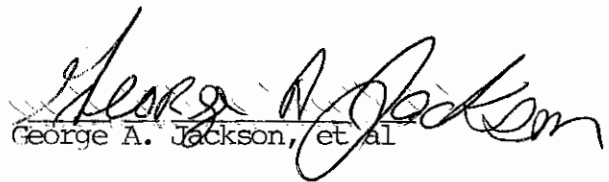
10.. State specifically and in detail , whether all vermin control equipment was properly working on or before July 20, 2005. If yes, produce such documents from inspection.

11. If answer to no. 10 is no, state what steps were taken, including any purchase or repair of any vermin control equipment as to prevent the entrance or harborage of rodents, insects and other vermin.

12. Produce all work orders submitted by Defendants prior to the filing of this Complaint submitted in regards to excessive heat or cold at the work place.

13. State specifically and in detail the model type, date of installation, inspection, maintenance and repair records or log pertaining to two (2) exhaust ventilation systems at the SCI Main Kitchen.

14. State whether you record and log regular daily temperatures at the SCI Main Kitchen Unit., If yes, produce such records..


George A. Jackson, et al

2/11/07

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al.,

Plaintiffs

v.

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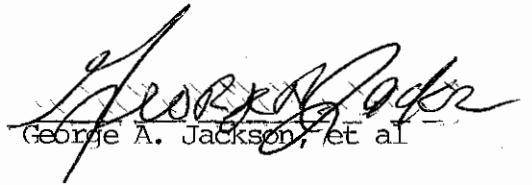
Civil Action No. 05-823-***

CERTIFICATE OF SERVICE

I, George A. Jackson certify that on February 11, 2007, I forward a copy of the said document, INTERROGATORIES to the Defendants by way of placing said document in the U.S. Mail Box at the SCI prison to be forward to:

EILEEN KELLY
Deputy ATTORNEY GENERAL
DEPARTMENT OF JUSTICE
820 N. FRENCH ST., 6th FL
Wilmington, DE 19801
ATTORNEY FOR DEFENDANTS

2/11/07


George A. Jackson, et al.

1/M GEORGE A. Jackson

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